

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

SHAWN MOORE, *on behalf of himself and
others similarly situated,*

Plaintiff,

v.

ALLIANCEONE RECEIVABLES
MANAGEMENT, INC.,

Defendant.

:
: Civil Action No.: 2:21-mc-51207-NGE-EAS
:
:
:
:
:
:
:
:
:
:
:
:
:
:

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
NON-PARTY REVSPRING, INC.’S MOTION TO QUASH PLAINTIFF’S RULE 45
SUBPOENA FOR DEPOSITION AND SUBPOENA *DUCES TECUM***

Shawn Moore (“Plaintiff”) respectfully move this Court for a one-week extension of time to file his response in opposition to non-party RevSpring, Inc.’s (“RevSpring”) motion to quash his subpoena. This extension would move Plaintiff’s response date from October 6, 2021 to October 13, 2021 In support of this request, Plaintiff states as follows:

1. On September 22, 2021, RevSpring filed its motion to quash Plaintiff’s subpoena.
2. Due to a number of conflicts and impending deadlines in unrelated cases, and due—in part—to the fact that Plaintiff did not know that RevSpring would seek to quash his subpoena until September 22, 2021, Plaintiff respectfully requests an additional week to adequately brief his opposition to RevSpring’s motion and confer with RevSpring’s counsel in an attempt to narrow the issues before the Court.
3. Plaintiff has not previously requested an extension of time to respond to RevSpring’s motion.
4. On September 27, 2021, Plaintiff’s counsel conferred with RevSpring’s counsel,

and RevSpring does not oppose this request.

Dated: September 28, 2021

Respectfully submitted,

/s/ Aaron D. Radbil

Aaron D. Radbil

Alexander D. Kruzyk

7601 N. Federal Highway, Suite A-230

Boca Raton, Florida 33487

Telephone: (561) 826-5477

aradbil@gdrlawfirm.com

akruzyk@gdrlawfirm.com

Counsel for Plaintiff and the proposed class

CERTIFICATE OF SERVICE

I certify that on September 28, 2021, the foregoing document was filed with the Court using CM/ECF, which will send notification of such to all counsel of record.

/s/ Aaron D. Radbil

Aaron D. Radbil